

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DR. KAROLINA MARCINIAK-DOMINGUES)
GONCALVES AGRA and MR. PEDRO)
MARCINIAK-DOMINGUES GONCALVES AGRA,)

Plaintiffs,)

v.)

CENTER FOR BRAINS, MINDS AND MACHINES)
AT MASSACHUSETTS INSTITUTE OF)
TECHNOLOGY, *et al.*,)

Defendants.)

) Case No. 1:23-cv-10305-JPC

DECLARATION OF LIANNE SHIELDS

I, Lianne Shields, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am currently the Director of Employee and Labor Relations at the Massachusetts Institute of Technology ("MIT"). I either have personal knowledge as to the facts and matters set forth in this Declaration or I have determined that such facts and matters are true and correct to the best of my knowledge on the basis of information obtained from various sources, including organizational records, documents maintained by MIT in the regular course of its work, other information brought to my attention in the course of my employment, and/or organizational documents within my possession and/or control.

2. I make this Declaration in response to the following statement by Plaintiffs in their Memorandum of Law in Opposition to MIT's Motion to Dismiss the Complaint (Dkt. 52):

Significantly, MIT proffers a sworn affidavit by Glen Shor, MIT's Vice President and Treasurer in support of its argument MIT lacks sufficient contacts with New York to be hauled into its courts but it does not provide the Court with a sworn affidavit by an MIT executive who is willing to testify that Azevedo was not an employee receiving any compensation from MIT in 2017 to the present or in any way definitely makes clear from MIT's point of view, what its relationship was and is with Azevedo. Plaintiff argues this

lack of such an affidavit on such a relevant point which MIT has the internal records to determine the issue one way or the other supports the existence of an employer-employee relationship between MIT and Azevedo, however, it suits MIT's position to keep this relationship's status ambiguous.

3. If called to testify, I would testify to the facts established as of this date set forth in this Declaration.

4. MIT never employed Dr. Frederico Azevedo prior to March 2021. In other words, prior to March 2021, Dr. Azevedo was not an employee receiving any compensation from MIT.

5. Since April 1, 2021, MIT has employed Dr. Azevedo as a Research Scientist at the McGovern Institute for Brain Research located at 524 Main Street, Floor 3, Room 3160, Cambridge, MA 02139.

6. For completeness, MIT has never employed Dr. Winrich Freiwald. In other words, Dr. Freiwald was never an employee receiving any compensation from MIT.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 6 day of March, 2024


Lianne Shields